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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DESIGNATION OF EXHIBITS IN
SUPPORT OF OBJECTION TO
CONFIRMATION AND RESERVATION
OF RIGHTS OF ADVENTIST HEALTH,
AT&T, PARADISE ENTITIES AND
COMCAST TO DEBTORS' AND**

- 1 ☐ Affects PG&E Corporation
- 2 ☐ Affects Pacific Gas and Electric Company
- 3 ☒ Affects both Debtors

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5 ** All papers shall be filed in the Lead Case,*

6 *No. 19-30088 (DM)*

**SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION DATED MARCH
16, 2020**

Date: May 27, 2020

Time: 10:00 a.m. (PT)

Place: United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

Judge: The Hon. Dennis Montali

1 PLEASE TAKE NOTICE that Adventist Health System/West and Feather River Hospital
2 d/b/a Adventist Health Feather River, each a California religious non-profit corporation; Paradise
3 Irrigation District, Paradise Unified School District, Northern Recycling and Waste Services,
4 LLC/Northern Holdings, LLC, Napa County Recycling & Waste Services, LLC/Napa Recycling &
5 Waste Services, LLC, Christian & Missionary Alliance Church of Paradise, dba Paradise Alliance
6 Church and Paradise Irrigation District; AT&T Corp. and all affiliates; and Comcast Cable
7 Communications, LLC and all affiliates (collectively, the “Objectants”), by and through their
8 respective undersigned counsel, hereby submit this *Designation of Exhibits* in support of their
9 *Objection to Confirmation and Reservation of Rights* [Dkt. No. 7339] (the “Objection”) regarding the
10 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16,*
11 *2020* [Dkt. No. 6320] (the “Plan”):

12 1. The Fire Victim Trust Agreement (with all Exhibits, including the Fire Victim Claims
13 Resolution Procedures attached as Exhibit D to the Notice of Filing of Plan Supplement in Connection
14 with Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March
15 16, 2020 [Dkt. No. 7037].

16 2. The Transcript of the May 15, 2020 hearing on the Objection.

17 3. The Transcript of the December 17, 2020 hearing on Debtors’ Motion Pursuant to 11
18 U.S.C. Sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I)
19 Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC,
20 Consenting Fire Claimant Professionals, and Shareholder Proponents and (II) Granting Related Relief
21 [# 5038].

22 PLEASE TAKE FURTHER NOTICE that the Objectants, both individually and collectively,
23 further reserve the right to designate additional exhibits upon the review of (a) any and all objections,
24 oppositions and reservations of rights that have been or will be filed in connection with confirmation
25 of the Plan, (b) the Debtors’ report on the results of balloting, and (c) any and all other events that
26 may occur before or during these confirmation proceedings.

1 Dated: May 18, 2020

RESPECTFULLY SUBMITTED:

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NORTON ROSE FULBRIGHT US LLP

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By: /s/ Rebecca J. Winthrop

Rebecca J. Winthrop

David A. Rosenzweig

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Attorneys for ADVENTIST HEALTH

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Dated: May 18, 2020

REED SMITH LLP

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By: /s/ David E. Weiss

David E. Weiss

Attorneys for PARADISE ENTITIES

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10 Dated: May 18, 2020

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By: /s/ Benjamin Mintz

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Dated: May 18, 2020

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By: /s/ Craig Goldblatt

Craig Goldblatt

Attorneys for COMCAST

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